

Exhibit G

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC.

Cross-Claimant,

vs.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

ARIANE ROWLAND, and JAMIE
SCHULZE,

Plaintiffs,

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC., WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA, and BRUCE
MAPLEY SR.,

Defendants.

Cause No. CV 20-59-BLG-SPW

**DEFENDANT WATCH TOWER
BIBLE AND TRACT SOCIETY OF
PENNSYLVANIA'S SECOND
SUPPLEMENTAL RESPONSES TO
PLAINTIFFS' SECOND SET OF
JURISDICTIONAL DISCOVERY**

TO: Plaintiffs and their counsel, Robert L. Stepans, Ryan R. Shaffer, and James C. Murnion, MEYER SHAFFER & STEPANS PLLP, 430 Ryman Street, Missoula, MT 59802

COMES NOW Defendant Watch Tower Bible and Tract Society of Pennsylvania (hereinafter "WTPA"), by and through its attorneys, and provides its

INTERROGATORY NO. 25: Please describe the relationship between the Governing Body, WTPA and WTNY for each year during the period 1970-1995 as it pertains to directing the affairs of Jehovah's Witness congregations in the United States.

ORIGINAL ANSWER: Objection. Please refer to WTPA's Third General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. Subject to and without waiving this objection: The Watch Tower Bible and Tract Society of Pennsylvania is a nonprofit corporation formed in 1884 under the laws of the Commonwealth of Pennsylvania, U.S.A. It is used by Jehovah's Witnesses to support their worldwide work, which includes publishing Bibles and Bible-based literature. Besides the Watch Tower Bible and Tract Society of Pennsylvania, Jehovah's Witnesses have other legal entities that perform various legal tasks associated with fulfilling Jesus' commission recorded at Matthew 28:19, 20. One such legal entity is Watchtower Bible and Tract Society of New York, Inc. (hereinafter "WTNY"), which prints Bibles and Bible-based literature that is used by Jehovah's Witnesses. Some of that literature is used in connection with the ministry done by Jehovah's Witnesses, again in connection with Jesus' commission in Matthew 28:19-20. Congregations form for the purpose of allowing Jehovah's Witnesses and others interested in attending their meetings to gather together to worship God. At their own choice, congregations may form

corporations or trusteeships to own property used as Kingdom Halls (meeting places). Those that do not form a corporation or trusteeship typically remain unincorporated associations. Each legal entity is separate and distinct from one another. The Governing Body of Jehovah's Witnesses is an ecclesiastical group of men who care for the spiritual interests of Jehovah's Witnesses. It has no legal or corporate control over any entity used by Jehovah's Witnesses.

FIRST SUPPLEMENTAL ANSWER: WTPA restates and reiterates its objections and response noted above. Subject to and without waiving its objections: WTPA further responds that it is not the Governing Body of Jehovah's Witnesses, but upon information and belief, the Governing Body provides spiritual guidance and direction to all Jehovah's Witnesses, including, but not limited to, setting forth the scriptural beliefs and practices of the faith in conformance with the model set by first century Christians as recorded in the Bible. The Governing Body does not direct the day-to day affairs of any congregation of Jehovah's Witnesses, but, during the time period in question, experienced elders in New York (members of the religious order) acknowledged the appointment of congregation elders and ministerial servants. Upon information and belief, acknowledgement of these appointments was communicated to congregations by WTNY. WTPA did not participate in that process.

INTERROGATORY NO. 26: Please describe the relationship between the Governing Body, WTPA and WTNY for each year during the period 1970-1995 as it pertains to responding to reports of child sex abuse by members of the congregations of Jehovah's Witnesses in the United States.

ORIGINAL ANSWER: Objection. Under Rule 33(a)(1), Fed.R.Civ.P., "[u]nless otherwise stipulated or ordered by the court, a party serve on any other party *no more* than 25 written interrogatories, including all discrete subparts." See Fed.R.Civ.P. 33(a)(1) (emphasis added). Here, there is no order from the Court, nor is there a stipulation, allowing Plaintiffs to propound more than the specified 25 interrogatory limit. Thus, under the plain language of Rule 33(a)(1), Fed.R.Civ.P., WTPA is not required to provide an Answer to this Interrogatory. Doing so could constitute a waiver of the objection based on Rule 33(a)(1), Fed.R.Civ.P., and pursuant to Local Rule 26.3(a)(4). WTPA has no intention of waiving the 25 interrogatory limit.

WTPA further objects to the time period requested. Please refer to WTPA's Third General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper.

FIRST SUPPLEMENTAL ANSWER: WTPA objects to the time period requested. Please refer to WTPA's Third General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper.

WTPA also objects on the grounds Plaintiffs' Interrogatory No. 26 goes beyond the 25 interrogatory limit provided in Rule 33(a)(1), Fed.R.Civ.P. *See, e.g., Kleiman v. Wright*, 2020 WL 1666787 (S.D. Fla. April 3, 2020). Subject to and without waiving said objections, as well as the objections in the Original Answer to Interrogatory No. 26: None Known.

SECOND SUPPLEMENTAL ANSWER: WTPA restates and reiterates its objections and responses noted above. Subject to and without waiving its objections: WTPA further responds that it is not the Governing Body of Jehovah's Witnesses, but upon information and belief, the Governing Body provides spiritual guidance and direction to all Jehovah's Witnesses, including, but not limited to, setting forth the scriptural beliefs and practices of the faith in conformance with the model set by first century Christians as recorded in the Bible. The Governing Body does not direct the day-to day affairs of any congregation of Jehovah's Witnesses, but, during the time period in question, experienced elders in New York (members of the religious order) were available to provide religious guidance to elders who inquired about the ecclesiastical handling of matters of serious sin (including child abuse) and repentance. Upon information and belief, WTNY was the corporation these experienced elders in New York used when communicating with congregation elders. Upon information and belief, in July 1989, WTNY's Legal Department was also available to provide legal assistance to congregation

elders who inquired about reporting obligations. WTPA had no participation in any of these processes.

INTERROGATORY NO. 27: Please identify all years between 1970 and 1995 during which WTNY was a subsidiary of WTPA.

ORIGINAL ANSWER: Objection. Under Rule 33(a)(1), Fed.R.Civ.P., “[u]nless otherwise stipulated or ordered by the court, a party serve on any other party *no more* than 25 written interrogatories, including all discrete subparts.” *See* Fed.R.Civ.P. 33(a)(1) (emphasis added). Here, there is no order from the Court, nor is there a stipulation, allowing Plaintiffs to propound more than the specified 25 interrogatory limit. Thus, under the plain language of Rule 33(a)(1), Fed.R.Civ.P., WTPA is not required to provide an Answer to this Interrogatory. Doing so could constitute a waiver of the objection based on Rule 33(a)(1), Fed.R.Civ.P., and pursuant to Local Rule 26.3(a)(4). WTPA has no intention of waiving the 25 interrogatory limit.

WTPA further objects to the time period requested. Please refer to WTPA’s Third General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper.

FIRST SUPPLEMENTAL ANSWER: WTPA objects to the time period requested. Please refer to WTPA’s Third General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper.

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and Watch Tower Bible and Tract Society of Pennsylvania*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA
MAPLEY,

Plaintiffs,

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC., WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA, and BRUCE
MAPLEY SR.,

Defendants.

Cause No. CV 20-52-BLG-SPW

**DEFENDANT WATCH TOWER
BIBLE AND TRACT SOCIETY OF
NEW YORK INC.'S SECOND
SUPPLEMENTAL RESPONSES TO
PLAINTIFFS' SECOND SET OF
JURISDICTIONAL DISCOVERY**

INTERROGATORY NO. 8: Please state how elders in each local congregation are selected and approved.

ORIGINAL ANSWER: Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. Subject to and without waiving this objection: Please see documents produced by Watch Tower Bible and Tract Society of Pennsylvania (hereinafter “WTPA”), bates-numbered WTPA0028758-0028784.

FIRST SUPPLEMENTAL ANSWER: Without waiving any previously asserted objections, responsive documents have previously been produced by WTPA as WTPA0028758-0028784.

INTERROGATORY NO. 9: Identify what the governing body does, where it is located, what it is responsible for, how it makes decisions, etc.?

ORIGINAL ANSWER: Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. This request is also irrelevant, is not reasonably calculated to lead to the discovery of admissible evidence, and is vague and ambiguous as to the term "etc." Subject to and without waiving these objections: The Governing Body is a small group of spiritually-mature Christians who provide spiritual guidance to Jehovah's Witnesses worldwide. The Governing Body follows the pattern set by “the apostles and elders in Jerusalem” in the first century, who made important decisions on behalf

of the entire Christian congregation. (Acts 15:2) Like those faithful men, the members of the Governing Body are not the leaders of Jehovah's Witnesses. The Governing Body serves in Warwick, New York, U.S.A.

FIRST SUPPLEMENTAL ANSWER: WTNY restates and reiterates its objections and response noted above. Subject to and without waiving its objection: WTNY further responds that it is not the Governing Body of Jehovah's Witnesses, but upon information and belief, the Governing Body provides spiritual guidance and direction to all Jehovah's Witnesses, including, but not limited to, setting forth the scriptural beliefs and practices of the faith in conformance with the model set by first century Christians as recorded in the Bible. The Governing Body does not direct the day-to day affairs of any congregation of Jehovah's Witnesses, but, during the time period in question, experienced elders in New York (members of the religious order) acknowledged the appointment of congregation elders and ministerial servants. Acknowledgement of these appointments was communicated to congregations by WTNY.

INTERROGATORY NO. 10: Where is the church's United States "Branch Office" located?

ORIGINAL ANSWER: Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. This request is also vague and ambiguous as to the term "church."

INTERROGATORY NO. 15: Please set forth your description of the relationships between the following: Governing Body, WTPA, WTNy, United States Branch Office, United States District Offices, United States Circuit Offices, and local Kingdom Halls/congregations (including whether any of these bodies oversee or direct, in any way, the activities of any other of these bodies).

ORIGINAL ANSWER: Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. This request is also vague and ambiguous as to the terms “Circuit Offices” and “District Offices.” Subject to and without waiving these objections: WTNy is a not-for-profit corporation formed in 1909 under the laws of the State of New York, U.S.A. It is used by Jehovah's Witnesses in the United States to print Bibles and Bible-based literature. Some of that literature is used in connection with the ministry done by Jehovah's Witnesses, again in connection with Jesus' commission in Matthew 28: 19, 20. WTPA is a nonprofit corporation formed in 1884 under the laws of the Commonwealth of Pennsylvania, U.S.A. It is used by Jehovah's Witnesses to support their worldwide work, which includes publishing Bibles and Bible-based literature. Congregations form for the purpose of allowing Jehovah's Witnesses and others interested in attending their meetings to gather together to worship God. At their own choice, congregations may form corporations or trusteeships to own property used as Kingdom Halls (meeting places). Those that do

not form a corporation or trusteeship typically remain unincorporated associations. Each legal entity is separate and distinct from one another.

The United States Branch Office of Jehovah's Witnesses is a religious construct that cares for the spiritual interests of Jehovah's Witnesses in the United States. It has no legal or corporate control over any entity used by Jehovah's Witnesses.

The Governing Body of Jehovah's Witnesses is an ecclesiastical group of men who care for the spiritual interests of Jehovah's Witnesses worldwide. It has no legal or corporate control over any entity used by Jehovah's Witnesses. WTNY is unaware of any "United States District Offices" or "United States Circuit Offices" associated with the faith of Jehovah's Witnesses.

FIRST SUPPLEMENTAL ANSWER: WTNY restates and reiterates its objections and response noted above. Subject to and without waiving its objection: WTNY further responds that it is not the Governing Body of Jehovah's Witnesses, but upon information and belief, the Governing Body provides spiritual guidance and direction to all Jehovah's Witnesses, including, but not limited to, setting forth the scriptural beliefs and practices of the faith in conformance with the model set by first century Christians as recorded in the Bible. The Governing Body does not direct the day-to-day affairs of any congregation of Jehovah's Witnesses, but, during the time period in question, experienced elders in New York (members of the

religious order) acknowledged the appointment of congregation elders and ministerial servants. Acknowledgement of these appointments was communicated to congregations by WTNY.

INTERROGATORY NO. 16: Please set forth your complete understanding of the location of each congregation in the state of Montana between 1960 and today.

ORIGINAL ANSWER: Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. Subject to and without waiving this objection: WTNY has been unable to locate any historical data concerning the location of Kingdom Halls in Montana during the relevant time-period based on the information in its possession, custody, or control. Discovery is ongoing and WTNY will supplement its answer if responsive information is located. As to current congregations in Montana, a listing can be found at the following hyperlink,

<https://apps.jw.org/ui/E/meeting-search.html#/weekly-meetings>

and clicking on Montana on the map. As this information is available on the internet, it is as easily accessible to Plaintiffs as it is to WTNY.

FIRST SUPPLEMENTAL ANSWER: Without waiving any previously asserted objections, WTNY has made a further inquiry and has located a list of congregations in Montana believed to be in existence during the relevant time-

ORIGINAL ANSWER: Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. Subject to and without waiving this objection: They were trained by the Bible. The ecclesiastical oversight they provided was helping local elders find relevant Bible verses that applied to questions the elders had.

FIRST SUPPLEMENTAL ANSWER: Without waiving any previously asserted objections, WTNy's original Answer included responsive information.

INTERROGATORY NO. 20: For the period 1960 to 1990, did Circuit, District, or Branch Overseers participate in the training and oversight of local congregation elders described in your Ans. To Int. No. 19, and if so, please describe such participation.

ORIGINAL ANSWER: Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. Subject to and without waiving this objection: Circuit and District Overseers may have provided Bible-based research and guidance to elders in Montana during the relevant time period on an as-needed basis, but the exact nature and extent of any such assistance is unknown based on the information in WTNy's possession, custody, or control.

FIRST SUPPLEMENTAL ANSWER: Without waiving any previously asserted objections, WTNy's original Answer included responsive information.